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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Frescia Anthuane GARRO PINCHI,

Petitioner,

v.

POLLY KAISER, Acting Field Office Director
of the San Francisco Immigration and Customs
Enforcement Office; TODD LYONS, Acting
Director of United States Immigration and
Customs Enforcement; KRISTI NOEM,
Secretary of the United States Department of
Homeland Security, PAMELA BONDI,
Attorney General of the United States, acting in
their official capacities,

Respondents.

CASE NO. 25-cv-05632

**DECLARATION OF BRAYAN
SANTIAGO ROPERO CANO**

1
2 I, Brayan Santiago Ropero Cano, declare under penalty of perjury pursuant to 28 U.S.C.
3 § 1746 as follows:

4 1. I have personal knowledge of the facts stated in this declaration and, if called as a
5 witness, could testify truthfully to those facts. Where I do not have personal knowledge, I
6 believe and am informed for the following information to be true.

7 2. I live with and am very close with Ms. Garro Pinchi, the petitioner in this case.
8 She and I are the closest relationship each of us have in the United States. We have lived
9 together for around two years and have been a constant source of mutual closeness and support
10 for each other. For example, I was the person who took care of her after her two surgeries this
11 year and looked after through all of her health challenges. We have shared all of the stories and
12 details about our experiences having to flee from our homes due to persecution, and we have
13 accompanied each other to our immigration check-ins and hearings. She was by my side when
14 I was granted my asylum by the United States government. She is the person I turn to for
15 comfort and support and that is what I strive to be for her too.

16 3. Because of our close relationship, I can affirm that she has medical conditions and
17 a medication regimen that necessitate her immediate release from ICE custody.

18 4. First, Ms. Garro Pinchi has recently been operated on for a vaginal tumor. She
19 continues to be monitored to prevent relapse. My understanding is that a recurrence of the
20 growth of this tumor would be life threatening which is why we monitor her closely and ensure
21 that her vaginal PH remains stabilized multiple times each day.

22 5. Ms. Garro Pinchi also has a severe generalized anxiety disorder, clinical
23 depression, and PTSD. These conditions require that she take medication every 8 hours. She is
24 currently detained without access to her medication, which is at our home. When she is without
25 her medication, she struggles from severe and unrelenting migraines all throughout the front
26 and back of her head in addition to trembling and cramping in her hands and feet. She wakes
27 up from night terrors in the middle of the night at least two times per week screaming and
28 unable to breathe, often jumping out of the bed due to fear and anxiety. Enclosed spaces

1 exacerbate her anxiety disorder and her symptoms, and it is medically impossible for her to
2 survive in an enclosed space such as a detention center without access to her medication.

3 6. In addition to melatonin, which she takes nightly in order to sleep, she also takes
4 an anti-depressant and anti-anxiety medication called Imipramine every 8 hours. She started
5 taking this medicine after her anxiety and depression symptoms spiraled out of control. She
6 was losing her hair, her stomach was in such severe pain that she couldn't keep down food, she
7 could not sleep at all at night and instead would awake screaming with night terrors. She also
8 could not regulate her breathing and suffered from panic attacks that exacerbated her asthma.
9 In order to treat the symptoms, she started taking Imipramine and this medicine is necessary in
10 order to manage the symptoms. After just a few hours in ICE custody she was already
11 experiencing physical withdrawal symptoms including heart palpitations, shakes, and shortness
12 of breath.

13 7. She also has a condition called helicobacter pylori, a stomach bacteria that can
14 cause stomach cancer and peptic ulcers. This is why she has to maintain a strict dietary
15 regimen as prescribed by a medical doctor. When she was detained, she had not yet eaten
16 breakfast and it is my understanding that she was not provided with a nutritious meal all day.
17 Drastic changes to her diet will undoubtedly exacerbate her helicobacter pylori condition.

18 8. She also has gastritis and as a result had to have an appendectomy last year.

19 9. Finally, she also suffers from asthma, a condition that intensifies in moments
20 when her anxiety disorder is exacerbated and when she is unable to access her medication due
21 to the ensuing inability to regulate her breathing.

22 10. Ms. Garro Pinchi has had two significant operations in the past year alone and is
23 in fragile condition. She has tremendous health challenges that require constant monitoring,
24 care, dietary restriction, and medication. If she continues to be detained without access to her
25 medication, her life will be at risk.

26 11. Additionally, Ms. Garro Pinchi has no criminal history whatsoever. I know this
27 with certainty because I helped her to upload documents attesting to the fact that she has no
28 criminal history; I read through these documents, which included a certificate issued by her

1 home country attesting to the fact that she has never committed a crime in Peru. I reviewed
2 and supported her in uploading these documents when I was helping her with a legal process
3 she was undergoing to request that the biological father of her daughter provide child support
4 and contributions to the cost of food and schooling of her daughter.

5 12. Ms. Garro Pinchi has always complied with the U.S. immigration laws. We have
6 both shared with each other our stories of fleeing persecution from our native countries. When
7 she told me her story, she told me that when she first came to the U.S., she was in the custody
8 of immigration officials for about one and a half days. She also told me that when she was
9 released, she was not released with an ankle shackle. She was released only with the paperwork
10 that was provided to her by immigration authorities, including documents that dictated that she
11 would have court appointments with a judge. Since her release, she has moved two times, and
12 has filed the necessary change-of-address paperwork both times. I also witnessed that she
13 never missed any of her court dates.

14 13. In addition, Ms. Garro Pinchi is the sole provider for her entire family: her
15 mother, her 7-year-old daughter, and several relatives who still live in Peru. Her mother has
16 diabetes and is fully dependent on Ms. Garro Pinchi. Her mother is only able to access insulin
17 and maintain her diet and health because Ms. Garro Pinchi's financial support. Her daughter is
18 also fully dependent on her for food and care; there is no financial or other support whatsoever
19 from the biological father or any other family member. Her mother and daughter rely on her
20 release to be able to survive.

21 14. Ms. Garro Pinchi is employed by Multistream Service, which is owned by the
22 same company that I work for as well, ABM. She works 40 hours per week. This work sustains
23 her entire family and her job is also essential to maintaining several large building spaces
24 functional for usage. She is extremely committed to her job and she relies on this job to survive
25 and to keep her mother, daughter, and relatives sustained and alive as well. She was recognized
26 as the employee of the month this past month and is deeply respected and esteemed by our
27 managers and coworkers for her consistency and dedication.
28

1 15. Finally, she has a beautiful community here in the Bay Area. We go together to
2 church in San Jose (the Latin American United Pentecostal Church or "IPUL" as it is known
3 by its Spanish language acronym) during the weekend. She is a beloved member of the church
4 community and our pastor and other members of the church have been contacting me to
5 express worry about her ever since she was detained yesterday. She is also a beloved neighbor,
6 and since she has been detained, our neighbors have been asking about her and are deeply
7 worried. We have attended class at Bayanihan Boxing, and when she was detained yesterday,
8 the coach and all of the students in the class were worried and anxious about how they could
9 help and are trying to figure out urgently where she is. She has formed deep ties with so many
10 people in the Bay Area who care deeply for her, and I am sure that if she is freed, she will
11 continue to live with me and will comply with all the legal requirements necessary for her to
12 continue to pursue her asylum case in the United States.

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16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18 Executed on July 4, 2025.



Brayan Santiago Roperero Cano

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21
22 I, Ariel Koren, declare under penalty of perjury that I am competent to interpret between
23 English and Spanish, and I read the foregoing declaration to Brayan Santiago Roperero Cano in the
24 Spanish language, and he affirmed its contents to be true..

25 Executed on July 4, 2025.



Ariel Koren